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By ECF

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Hon. Joseph F. Bianco
U.S. District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Johnson & Johnson et al. v. Levin, 16-cv-6631-JFB-AYS.

Dear Judge Bianco:

We represent Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (incorrectly sued as Johnson & Johnson Consumer Companies, Inc.) (“JJC”) in the above referenced action. We write to oppose Plaintiff’s request for a pre-motion conference in anticipation of a motion for default judgment against Johnson & Johnson Consumer Companies, Inc.

JJC has answered and defended this action in accordance with all applicable dates and orders from the Court, and is thus not in default. Plaintiff’s confusion regarding entity names relates to a restructuring of Johnson & Johnson’s subsidiary operating companies. On June 29, 2015, Johnson & Johnson Consumer Inc. assumed responsibility for Johnson’s® Baby Shampoo, the product at issue in this litigation.

We are available at the Court’s convenience should more information be necessary.

Respectfully submitted,



Louis M. Russo